

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

JULIANA RODRIGUEZ MOREL

f/k/a JULIANA MOREL MARIANO,

Plaintiff

v.

1:21-CV-00040-AJ

MAMMOTH TECH, INC.

f/k/a CREDIT ADJUSTMENTS, INC.,

f/k/a CAI OF OHIO,

Defendant

MOTION TO EXTEND TIME FOR FILING MOTION FOR DEFAULT JUDGMENT

NOW COMES the plaintiff, Juliana Rodriguez Morel, by and through her attorneys, Douglas, Leonard & Garvey, P.C., and respectfully requests that this Honorable Court extend the time for filing her Motion for Default Judgment and, in support thereof, states as follows:

1. Megan E. Douglass, Esquire, the principal attorney for the plaintiff, was rushed by ambulance to the hospital last night for a medical emergency. Attorney Douglass was hospitalized overnight. Attorney Douglass was discharged late this morning, but her condition will require monitoring for the next several days and will require her to adjust to new medication.

2. The Court has set an August 12, 2022, deadline for the filing of a Motion for Default Judgment in this case.

3. Attorney Douglass is the only attorney in this office with the knowledge to draft the Motion.

4. These circumstances require the plaintiff to seek an extension of time until August 26, 2022, for the plaintiff to file the Motion for Default Judgment.

5. Undersigned counsel does not know whether the 2-week extension requested will necessitate rescheduling of the September 26, 2022, damages hearing.

6. No memorandum of law is believed to be required, given the discretionary nature of the relief requested.

WHEREFORE, the plaintiff Juliana Morel respectfully prays this Honorable Court:

A. Enlarge her deadline for filing the Motion for Default Judgment until August 26, 2022;
and

B. Grant such other and further relief as is just and equitable.

Respectfully submitted,
JULIANA RODRIGUEZ MOREL
By her attorneys,
DOUGLAS, LEONARD & GARVEY, P.C

Date: August 10, 2022

By: /s/ Benjamin T. King
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this date upon all counsel of record via the ECF filing system.

/s/ Benjamin T. King
Benjamin T. King